

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re:

Demetrice Antonio Jones  
Cheryl Dionne Jones

Case No. 15-35268-KLP

Debtors

Chapter 13

21500 Court St.  
S. Chesterfield, VA 23803

AP No. 15-03459

Last four digits of Social Security or Individual Tax-payer  
Identification (ITIN) No(s)., (if any): 8179, 2467

v.

Old Towne Motors, Inc.

Defendants

**NOTICE OF MOTION**

Debtor(s) have filed papers with the court to Shorten Time for Filing Answers to Motion to Recover Property of the Bankruptcy Estate Pursuant to 11 U.S.C. § 362 (a).

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the motion (or objection), or if you want the court to consider your views on the motion (or objection), then on or before November 10, 2015 at 10:30 a.m., you or your attorney must:

[ X] File with the court, at the address shown below, a written request for a hearing [or a written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for hearing (or response) to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:  
Brian K. Stevens, Esquire

The American Law Group, Inc.  
2312 Boulevard, Colonial Heights, VA 23834

- ☐ Attend a hearing to be scheduled at a later date. You will receive separate notice of hearing. **If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.**
- ☒ Attend the hearing on the motion (or objection) scheduled to be held on **November 10, 2015 at 10:30** at the United States Bankruptcy Court, 701 East Broad Street, Ctrrm 5100 Richmond, VA 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: November 3, 2015

Signature, name, address, and telephone  
number of person giving notice:

/s/ Brian K. Stevens

Brian K. Stevens, Esq.

The America Law Group, Inc.

2312 Boulevard

Colonial Heights, VA 23834

804-921-9244

Counsel for Demetrice Antonio Jones and  
Cheryl Dionne Jones

Certificate of Service

I hereby certify that I on November 3, 2015, I have mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the Defendant, Old Towne Motors, Inc., William David Mueller, Registered Agent, 544 East Washington Street, Petersburg, VA 23803.

/s/ Brian K. Stevens

Brian K. Stevens, Esq.

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v.

Old Towne Motors, Inc.

Defendants

**MOTION TO SHORTEN TIME FOR RESPONSES TO DEBTOR'S  
NOTICE OF DEBTOR'S MOTION TO RECOVER PROPERTY OF THE  
BANKRUPTCY ESTATE**

COMES NOW, the Debtor, by counsel, and as and for their Motion To Shorten Time For Responses to Debtor's Notice of Debtor's Motion to Recover Property of the Bankruptcy Estate pursuant to U.S.C. §362(a), and states as follows:

1. On November 3, 2015, the Debtor filed a Motion to Recover Property of the Bankruptcy Estate pursuant to U.S.C. §362(a)
2. To date there has been no response or objection to the Motion.

WHEREFORE, the Debtors respectfully request that the Court enter an Order shortening the time for the filing of responses to Debtor's Motion to Recover Property of the Bankruptcy Estate, and for such other relief as the Court may deem appropriate.

Demetrice Antonio Jones and  
Cheryl Dionne Jones

By /s/ Brian K. Stevens  
Brian K. Stevens, Esq.  
The America Law Group, Inc.

2312 Boulevard

Colonial Heights, VA 23834  
804-520-2428

Certificate of Service

I hereby certify that I on November 3, 2015, have mailed or hand-delivered a true copy of the foregoing Notice of Motion (or Objection) to the Defendant, Old Towne Motors, Inc., William David Mueller, Registered Agent, 544 East Washington Street, Petersburg, VA 23803.

/s/ Brian K. Stevens  
Brian K. Stevens, Esq.

